

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ZURICH AMERICAN INSURANCE)	
COMPANY,)	
)	
Plaintiff and Counterclaim-Defendant,)	
)	
v.)	Case No. 1:21-cv-11621-PBS
)	
MEDICAL PROPERTIES TRUST, INC.,)	
)	
Defendant and Counterclaim-Plaintiff.)	

**STIPULATION AND [PROPOSED] ORDER OF
DISMISSAL WITH PREJUDICE**

Pursuant to Rule 41 of the Federal Rules of Civil Procedure, Plaintiff and Counterclaim-Defendant Zurich American Insurance Company (“Zurich”) and Defendant and Counterclaim-Plaintiff Medical Properties Trust, Inc. (“MPT”), by and through their undersigned counsel, hereby STIPULATE AND AGREE that all of Zurich’s and MPT’s claims against each other in the above-captioned action shall be dismissed with prejudice, with Zurich and MPT each to bear their own attorneys’ fees and costs.

[Signatures on next page.]

Respectfully submitted,

**ZURICH AMERICAN INSURANCE
COMPANY**

By its attorney,

/s/ Michael Menapace

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MEDICAL PROPERTIES TRUST, INC.

By its attorneys,

/s/ Martin C. Pentz

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Dated: November 13, 2024

IT IS SO ORDERED this _____ day of _____, 2024.

The Honorable Patti B. Saris
United States District Court Judge

CERTIFICATE OF SERVICE

I, Martin C. Pentz, hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and that paper copies will be sent to those indicated as non-registered participants on November 13, 2024.

/s/ Martin C. Pentz
Martin C. Pentz